



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 18, 2014

BY ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1610
New York, New York 10007

The Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 2104
New York, New York 10007

**Re: United States v. Patrick Taylor,
S1 13 Cr. 88 (DLC)**

Dear Judges Cote and Sullivan:

The Government respectfully submits this letter in accordance with the Court's procedure regarding the sentencing of defendants in factually-related cases that are pending before different judges.

The "related-cases" procedure provides in pertinent part that, when the Government is filing a motion on behalf of a defendant pursuant to United States Sentencing Guidelines Section 5K1.1, the Government, prior to sentencing, is to provide the judge with a "brief statement identifying any prior proceedings in which the defendant has testified before a different judge pursuant to a cooperation agreement." Such statement is to be provided to both the assigned sentencing judge and the judge before whom the defendant testified.

On February 25, 2013, defendant Patrick Taylor pled guilty before Judge Cote to the charges in Superseding Information S1 13 Cr. 88 (DLC) pursuant to a cooperation agreement with the Government. In March 2013, Taylor testified at the trial of United States v. Jermaine Dore and Dwayne Barrett, S2 12 Cr. 45 (RJS), before Judge Sullivan. In March 2014, Taylor testified at the trial of United States v. Damian Cunningham, S3 12 Cr. 45 (RJS), also before Judge Sullivan. Dore, Barrett, and Cunningham were all convicted after trial. Dore has been sentenced, but Barrett and Cunningham are scheduled to be sentenced on April 7, 2014 and July 25, 2014, respectively.

The Government submits this letter to request that a pre-sentence investigation report be ordered for Taylor and that the matter be set down for sentencing for a date in August 2014 or thereafter.

Hon. Denise L. Cote and Hon. Richard J. Sullivan

March 18, 2014

Page 2 of 2

Please let me know if any additional information is required.

Respectfully submitted,

PREET BHARARA
United States Attorney

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cc: Florian Miedel, Esq.